



Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

December 9, 2003

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Avery Dennison / 089-17858-00407

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

### **Notice of Decision: Approval – Effective Immediately**

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

Pursuant to 326 IAC 2-7-18(d), any person may petition the U.S. EPA to object to the issuance of a Title V operating permit or modification within sixty (60) days of the end of the forty-five (45) day EPA review period. Such an objection must be based only on issues that were raised with reasonable specificity during the public comment period, unless the petitioner demonstrates that it was impracticable to raise such issues, or if the grounds for such objection arose after the comment period.

To petition the U.S. EPA to object to the issuance of a Title V operating permit, contact:

U.S. Environmental Protection Agency  
401 M Street  
Washington, D.C. 20406

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

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Mr. Kevin Cherney  
Avery Dennison  
670 Hardy Road, Building 11  
Painesville, Ohio 44077

**December 9, 2003**

Re: 089-17858-00407  
First Minor Permit Modification to:  
Part 70 Permit No.: T089-7463-00407

Dear Mr. Cherney:

Avery Dennison was issued a permit on July 14, 1999, for a vinyl coating on plastic parts manufacturing plant. A letter requesting changes to this permit was received on August 21, 2003. Pursuant to the provisions of 326 IAC 2-7-12, a minor permit modification to this permit is hereby approved as described in the attached Technical Support Document.

This modification consists of the construction of a bypass on the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3), such that when using emulsion coating, emissions are vented through the bypass, instead of the thermal oxidizer used as control on L-3.

All other conditions of the permit shall remain unchanged and in effect. The entire permit is enclosed.

Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Sanobar Durrani, ERG, 1600 Perimeter Park Drive, Morrisville, North Carolina 27560, or call (919) 468-7810 to speak directly to Ms. Durrani. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

**Original signed by**  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

ERG/SD

cc: File - Lake County  
U.S. EPA, Region V  
Lake County Health Department  
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejula  
Northern Regional Office  
Compliance Data Section - Karen Ampil  
Administrative and Development - Sarah Cloe  
Technical Support and Modeling - Michele Boner



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## PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Avery Dennison MFD**  
**270 West Meadow Place**  
**Lowell, Indiana 46356**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7463-00407	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: July 14, 1999  Expiration Date: July 14, 2004

First Minor Source Modification 089-12713-00407, issued on December 14, 2000  
First Significant Permit Modification 089-12832-00407, issued on January 26, 2001  
First Reopening R089-13358-00407, issued October 19, 2001

First Minor Permit Modification 089-17858-00407	Pages Affected: 5, 26, 29
Issued by: <b>Original signed by</b> Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: <b>December 9, 2003</b>

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Emergency/Deviation Occurrence Report

Semi-Annual Compliance Monitoring Report Form

Quarterly Report

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary vinyl coated manufacturing operation.

Responsible Official: Heinz Pichler, Vice President, Worldwide Graphics  
Source Address: 270 West Meadow Place, Lowell, Indiana 46356  
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356  
SIC Code: 3089  
County Location: Lake  
County Status: Severe Nonattainment for Ozone,  
Attainment for all other criteria pollutants  
Source Status: Part 70 Permit Program  
Major Source, under Emission Offset Rules;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, except when using emulsion coating, and exhausting to one (1) stack (S-3).

### A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.



- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22).
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ within a reasonable time, any information that IDEM, OAQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]**

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- (a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);
  - (5) Any insignificant activity that has been added without a permit revision;
  - (6) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-888-209-8892 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 219-881-6712 (ask for Compliance Section)

Facsimile Number: 219-881-6745

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
  - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
  - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
    - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
    - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit;  
or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC 2-7-12(b)(8)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

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Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

**B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination**  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30)



days in advance of the date this permit is to be reopened, except that IDEM, OAQ may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

- (1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due. [326 IAC 2-5-3]

- (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ any additional information identified as being needed to process the application.

- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**

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The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
- (b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

**B.22 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any approval required by 326 IAC 2-1 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.23 Construction Permit Requirement [326 IAC 2]**

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Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

**B.24 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]
  - (1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ nor an authorized representative, may disclose the information unless and until IDEM, OAQ makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]
  - (2) The Permittee, and IDEM, OAQ acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

**B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]**

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Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be

submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) IDEM, OAQ shall reserve the right to issue a new permit.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

**C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

**C.2 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

- (a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.
- (b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

**C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]**

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

**C.5 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

**C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]**

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). The source does not have any fugitive Particulate Matter (PM) emissions and therefore comply with this opacity limit.

**C.7 Operation of Equipment [326 IAC 2-7-6(6)]**

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at

least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

##### **C.10 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

##### **C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



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**C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]**

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- (a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

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**C.13 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

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**C.14 Temperature Gauge Specifications**

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Unless otherwise specified in Section D of this permit, whenever a condition in this permit requires the measurement of temperature drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ( $\pm 2\%$ ) of full scale reading.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

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**C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

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Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 11, 1996 with the Part 70 Permit Application.
- (b) If the ERP is disapproved by IDEM, OAQ the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (e) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.  
[326 IAC 1-5-3]

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**C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.
- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326

IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

**C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

**C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

**C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;

- (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

**C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]**

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- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Semi-Annual Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.
- (d) Unless otherwise specified in this permit, any semi-annual report shall be submitted within thirty (30) days of the end of the reporting period.
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**Stratospheric Ozone Protection**

**C.22 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); and
- (c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, except when using emulsion coating, and exhausting to one (1) stack (S-3).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), the Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, two and nine-tenths (2.9) pounds of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2), except when emulsion coating is being used in L-3. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 12] [40 CFR 60.440, Subpart RR]

Pursuant to 40 CFR 60.442(a)(2), the Permittee shall demonstrate a ninety percent (90%) overall Volatile Organic Compound (VOC) emission reduction as calculated over a calendar month for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3).

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### Compliance Determination Requirements

#### D.1.4 Volatile Organic Compounds and HAPs [326 IAC 2-3] [326 IAC 2-4.1]

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Input of VOC and HAP to the surface coating head (CH-1) shall be limited to less than five hundred (500) tons per year. At a control efficiency of at least 98% for the thermal oxidizer, these usage limits shall effectively limit emissions of VOC and HAP to less than ten (10) tons per year. Compliance with these limits shall make the Emission Offset and New source Toxics Control rules not applicable.

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**D.1.5 Compliance Provisions [40 CFR 60.443, Subpart RR]**

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Pursuant to 40 CFR 60.443:

- (a) To determine compliance with § 60.442(a)(2), the Permittee shall calculate the required overall Volatile Organic Compound (VOC) emission reduction for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) according to the following equation:

$$Rq = (G - 0.20) / G * 100$$

where:

G = the calculated weighted average pound of Volatile Organic Compound (VOC) per pound of coating solids applied each calendar month.

If Rq is less than or equal to 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is Rq. If Rq is greater than 90 percent, then the required overall Volatile Organic Compound (VOC) emission reduction is 90 percent.

- (b) The Permittee shall determine calendar monthly compliance for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) by comparing the monthly required overall Volatile Organic Compound (VOC) emission reduction Rq to the overall Volatile Organic Compound (VOC) emission reduction demonstrated in the most recent performance test which complied with § 60.442(a)(2). If the monthly required overall Volatile Organic Compound (VOC) emission reduction is less than or equal to the overall Volatile Organic Compound (VOC) reduction of the most recent performance test, the affected facility is in compliance with § 60.442(a)(2).
- (c) The Permittee shall continuously record the destruction device combustion temperature for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) during coating operations for thermal incineration destruction devices. The Permittee shall record all 3-hour periods (during actual coating operations) during which the average temperature of the device is more than 28 " C (50 " F) below the average temperature of the device during the most recent performance test complying with § 60.442(a)(2).
- (d) After the initial performance test required for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) under § 60.8, compliance with the Volatile Organic Compound (VOC) emission reduction limitation and percentage reduction requirements under § 60.442 is based on the average emission reduction for one calendar month. A separate compliance test is completed at the end of each calendar month after the initial performance test, and a new calendar month's average Volatile Organic Compound (VOC) emission reduction is calculated to show compliance with the standard.
- (e) Startups and shutdowns are normal operations for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3).



Emissions from these operations are to be included when determining if the standard specified at § 60.442(a)(2) is being attained.

#### D.1.6 Testing Requirements [40 CFR 60.444, Subpart RR]

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- (a) Pursuant to 40 CFR 60.444, Subpart RR, the performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) shall be determined by averaging the results of three test runs as specified in § 60.8(f).
- (1) Determine for each affected facility prior to each test run the weighted average mass of Volatile Organic Compound (VOC) per mass of coating solids applied being used at the facility. The weighted average shall be determined as specified in § 60.443(a). In this application, the quantities of  $W_{ci}$ ,  $W_{si}$ , and  $M_{ci}$  shall be determined for the time period of each test run and not a calendar month as specified in § 60.441.
- (2) Calculate the required percent overall Volatile Organic Compound (VOC) emission reduction  $R_q$ .
- (3) Determine the percent overall Volatile Organic Compound (VOC) emission reduction device by the following equation and procedures:

$$R = [ 3 Q_{bi} C_{bi} - 3Q_{aj} C_{aj} ] / [ 3Q_{bi} C_{bi} + 3Q_{fk} C_{fk} ] * 100$$

where:

- $Q_{bi}$  = the volumetric flow rate of each effluent gas stream (i) entering the emission control device, in dry standard cubic feet per hour.
- $C_{bi}$  = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (i) entering the emission control device, in parts per million by volume.
- $Q_{aj}$  = the volumetric flow rate of each effluent gas stream (j) exiting the emission control device, in dry standard cubic feet per hour.
- $C_{aj}$  = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (j) exiting the emission control device, in parts per million by volume.
- $Q_{fk}$  = the volumetric flow rate of each effluent gas stream (k) emitted to the atmosphere, in dry standard cubic feet per hour.
- $C_{fk}$  = the concentration of Volatile Organic Compound (VOC) (carbon equivalent) in each gas stream (k) emitted directly to the atmosphere, in parts per million by volume.
- (A) The Permittee shall construct the overall Volatile Organic Compound (VOC) emission reduction systems to that all volumetric flow rates and total Volatile Organic Compound (VOC) emissions can be accurately determined by the applicable test method and procedures specified in § 60.446(b).
- (B) The Permittee shall construct a temporary total enclosure around the coating line applicator and flashoff area during the performance test for the purpose of capturing fugitive Volatile Organic Compound (VOC) emissions. If a permanent total enclosure exists in the affected facility prior to the performance test and the Commissioner is satisfied that the enclosure is totally capturing fugitive Volatile Organic Compound (VOC) emissions, then no additional total enclosure will be required for the performance test.

- (C) For each affected facility where the value of R is greater than or equal to the value of Rq calculated in § 60.443(b), compliance with § 60.442(a)(2) is demonstrated.

(b) Pursuant to 40 CFR 60.446, Subpart RR:

- (1) Reference Test Method 25 shall be used to determine the Volatile Organic Compound (VOC) concentration in parts per million by volume, of each effluent gas stream entering and exiting the solvent destruction device or its equivalent, and each effluent gas stream emitted directly to the atmosphere for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). Reference Methods 1, 2, 3, and 4 shall be used to determine the sampling location, volumetric flow rate, molecular weight, and moisture of all sampled gas streams. For Reference Method 25 and 25A, the sampling time for each of three runs must be at least 1 hour. The minimum sampling volume must be 0.003 dscm except that shorter sampling times or smaller volumes, when necessitated by process variables or other factors, may be approved by the Commissioner.
- (2) If the Permittee can demonstrate to the Commissioner's satisfaction that testing of representative stacks yields results comparable to those that would be obtained by testing all stacks, the Commissioner will approve testing of representative stacks on a case-by-case basis.

**D.1.7 Volatile Organic Compounds (VOC)**

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Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

**D.1.8 Volatile Organic Compounds (VOC) and HAPs [326 IAC 2-3] [326 IAC 2-4.1]**

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Compliance with the VOC and HAP usage limitations contained in Condition D.1.4 shall be determined using formulation data supplied by the coating manufacturer.

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.9 Volatile Organic Compound (VOC) [40 CFR 60.445, Subpart RR]**

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Pursuant to 40 CFR 60.445, the Permittee shall install, calibrate, maintain, and operate a monitoring device which continuously indicates and records the temperature of the solvent destruction device's exhaust gases for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3). The monitoring device shall have an accuracy of the greater of  $\pm 0.75$  percent of the temperature being measured expressed in degrees Celsius or  $\pm 2.5$  N C.

**D.1.10 Thermal Oxidizer**

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To ensure compliance with Conditions D.1.1 and D.1.2:

- (a) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl rollcoating line (identified as L-2) is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,083EF or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.
- (b) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation, except when using emulsion coating. The thermal oxidizer shall maintain a minimum operating temperature of 1,273EF or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.

Avery Dennison MFD  
Lowell, Indiana  
Permit Reviewer: Catherine Moore

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Modified by: ERG/SD

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## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.11 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used for each day;
  - (4) The cleanup solvent usage for each day;
  - (5) The total VOC usage for each day; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) Pursuant to 40 CFR 60.445:
  - (1) The Permittee shall maintain a calendar month record of all coatings used for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3) and the results of the reference test method specified in § 60.446(a) or the manufacturer's formulation data used for determining the Volatile Organic Compound (VOC) content of those coatings.
  - (2) Records of the measurements required by §§ 60.443 and 60.445 must be retained for at least two years following the date of the measurements.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### **D.1.12 Reporting Requirements [40 CFR 60.447, Subpart RR]**

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- (a) For the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the performance test and results from the performance test shall be submitted to the Commissioner as specified in § 60.8(a) of the General Provisions (40 CFR part 60, subpart A).
- (b) Following the initial performance test for the one (1) pressure-sensitive vinyl rollcoating line (L-2) and the one (1) pressure-sensitive vinyl/paper rollcoating line (L-3), the Permittee shall submit quarterly reports to the Commissioner of exceedances of the Volatile Organic Compound (VOC) emission limits specified in § 60.442. If no such exceedances occur during a particular quarter, a report stating this shall be submitted to the Commissioner semi-annually.
- (c) The Permittee shall also submit reports at the frequency specified in § 60.7(c) when the incinerator temperature drops as defined in § 60.443(e). If no such periods occur, the Permittee shall state this in the report.

- (d) The requirements of this subsection remain in force until and unless EPA, in delegating enforcement authority to a State under section 111(c) of the Act, approves reporting requirements or an alternate means of compliance surveillance adopted by such States. In that event, affected sources within the State will be relieved of the obligation to comply with this subsection, provided that they comply with the requirements established by the State.

#### D.1.13 Reporting Requirements [326 IAC 2-3]

A quarterly summary of the information to document compliance with Condition D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

## **SECTION D.2 FACILITY OPERATION CONDITIONS**

### **Facility Description [326 IAC 2-7-5(15)]**

#### **(Insignificant Activity)**

- (a) VOC and HAP storage tanks with capacities less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### **Emission Limitations and Standards [326 IAC 2-7-5(1)]**

#### **D.2.1 Volatile Organic Compounds (VOCs) [326 IAC 8]**

Any change or modification to these facilities that would increase potential volatile organic compound (VOC) emissions, as specified in 326 IAC 2-1, must be approved by the Office of Air Quality (OAQ) before such change or modification can occur.

### **Compliance Determination Requirements**

#### **D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.2.3 Monitoring**

Monitoring of this facility is not required by this permit. However any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.2.4 Record Keeping Requirements**

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall maintain the following records for the life of each storage tank:

- (a) The vessel identification number.
- (b) The vessel dimensions.
- (c) The vessel capacity.

## SECTION D.3

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

#### (Insignificant Activity)

- (b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Volatile Organic Compound (VOC) [326 IAC 8-3-2]

Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

- (a) Equip the cleaner with a cover;
- (b) Equip the cleaner with a facility for draining cleaned parts;
- (c) Close the degreaser cover whenever parts are not being handled in the cleaner;
- (d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;
- (e) Provide a permanent, conspicuous label summarizing the operation requirements;
- (f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

#### D.3.2 Volatile Organic Compound (VOC) [326 IAC 8-3-5]

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:
  - (1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:
    - (A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F));
    - (B) The solvent is agitated; or
    - (C) The solvent is heated.
  - (2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), then



the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

- (3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).
  - (4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.
  - (5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38°C) (one hundred degrees Fahrenheit (100°F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9°C) (one hundred twenty degrees Fahrenheit (120°F)):
    - (A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
    - (B) A water cover when solvent is used is insoluble in, and heavier than, water.
    - (C) Other systems of demonstrated equivalent control such as a refrigerated chiller or carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.
- (b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:
- (1) Close the cover whenever articles are not being handled in the degreaser.
  - (2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.
  - (3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

### **Compliance Determination Requirements**

#### **D.3.3 Testing Requirements [326 IAC 2-7-6(1),(6)]**

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The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limits specified in Conditions D.3.1 and D.3.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

#### **D.3.4 Monitoring**

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Monitoring of this facility is not required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1, may require this facility to have monitoring requirements.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
CERTIFICATION**

Source Name: Avery Dennison MFD  
Source Address: 270 West Meadow Place, Lowell, Indiana 46356  
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356  
Part 70 Permit No.: T089-7463-00407

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Avery Dennison MFD  
Source Address: 270 West Meadow Place, Lowell, Indiana 46356  
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356  
Part 70 Permit No.: T089-7463-00407

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2

- 9 1.** This is an emergency as defined in 326 IAC 2-7-1(12)  
c The Permittee must notify the Office of Air Quality (OAQ), within four **(4)** business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
c The Permittee must submit notice in writing or by facsimile within two **(2)** days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9 2.** This is a deviation, reportable per 326 IAC 2-7-5(3)(c)  
c The Permittee must submit notice in writing within ten **(10)** calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?      Y      N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
SEMIANNUAL COMPLIANCE MONITORING REPORT**

Source Name: Avery Dennison MFD  
Source Address: 270 West Meadow Place, Lowell, Indiana 46356  
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356  
Part 70 Permit No.: T089-7463-00407

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted semi-annually. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	Number of Deviations	Date of each Deviation

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: Avery Dennison MFD  
Source Address: 270 West Meadow Place, Lowell, Indiana 46356  
Mailing Address: 270 West Meadow Place, Lowell, Indiana 46356  
Part 70 Permit No.: 089-7463-00407  
Facility: Surface Coating Head CH-1  
Parameter: VOC/HAP  
Limit:: Five Hundred (500) tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	VOC/HAP Usage (tons)	VOC/HAP Usage (tons)
	This Month	12 Month Total
Month 1		
Month 2		
Month 3		

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.



**issued December 9, 2003**

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a  
Part 70 Minor Permit Modification**

**Source Background and Description**

Source Name:	Avery Dennison
Source Location:	270 West Meadow Place, Lowell, Indiana 46356
County:	Lake
SIC Code:	3089
Operation Permit No.:	T089-7463-00407
Operation Permit Issuance Date:	July 14, 1999
Minor Permit Modification No.:	089-17858-00407
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed a modification application from Avery Dennison relating to the operation of the following emission unit:

One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (MMBtu/hour) natural gas fired thermal oxidizer as VOC control, except when using emulsion coating and exhausting to one (1) stack (S-3).

**History**

Avery Dennison is an existing vinyl coating on plastic parts manufacturing plant. Their Part 70 permit (T089-7463-00407) was issued on July 14, 1999. On August 21, 2003, Avery Dennison submitted an application to IDEM, OAQ requesting to modify the existing pressure-sensitive vinyl/paper rollcoating line (identified as L-3) to also use emulsion coating. Due to the high water content of the product, the emulsion cannot be controlled with a thermal oxidizer. Therefore, a bypass will be constructed such that when using emulsion coating, the emissions are vented through the bypass and not through the thermal oxidizer.

**Enforcement Issue**

There are no enforcement actions pending.

**Recommendation**

The staff recommends to the Commissioner that the Part 70 Minor Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on August 21, 2003.

## Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, page 1 of 1).

## Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	0
PM10	0
SO <sub>2</sub>	0
VOC	2.1
CO	0
NO <sub>x</sub>	0
Single HAP	<10
Combination of HAPs	<25

## Justification for Modification

The construction of the proposed bypass on the pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is exempt from construction permitting requirements because the potential to emit from L-3 when using emulsion coating is less than the exemption thresholds in 326 IAC 2-1.1-3(d)(1)(E), and less than the Part 70 Source Modification requirements in 326 IAC 2-7-10.5. The Part 70 Operating permit is being modified through a Part 70 Minor Permit Modification pursuant to 326 IAC 2-7-12(b) because this is a modification which meets all the criteria in 326 IAC 2-7-12(b)(1).

## County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM10	Moderate nonattainment
SO <sub>2</sub>	Primary nonattainment
NO <sub>2</sub>	Attainment
Ozone	Severe nonattainment
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone. Therefore,

VOC emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

- (b) **Fugitive Emissions**  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

### Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	<100
PM10	<100
SO <sub>2</sub>	<100
VOC	>250
CO	<100
NO <sub>x</sub>	<100

- (a) This existing source is a major stationary source because a severe nonattainment regulated pollutant is emitted at a rate of 25 tons per year or more.
- (b) These emissions are based upon the TSD for Permit No.T089-7463-00407.

### Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	PM	PM10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Coating Head (CH-1)	0	0	0	10.0	0	0	0
Pressure sensitive vinyl rollcoating line, when using emulsion coating	0	0	0	2.10	0	0	0
Total	0	0	0	12.1	0	0	0
Emission Offset significant thresholds	25	15	40	25	100	40	NA

The increase in the potential to emit of VOC from the source over the past five years, is less than twenty-five (25) tons per year. Therefore, this modification to an existing major stationary source is

not major because the aggregated emissions increase over the last five (5) years is less than the Emission Offset significant levels as described in 326 IAC 2-3 (ee). Therefore, pursuant to 326 IAC 2-3, the Emission Offset requirements do not apply.

### **Federal Rule Applicability**

- (a) The one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is subject to the New Source Performance Standard 326 IAC 12, (40 CFR 60.440, Subpart RR - Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations) because it was constructed on June 1, 1988, which is after the December 30, 1980 applicability date for this rule. Pursuant to this subpart, the Permittee shall demonstrate a 90% overall volatile organic compound (VOC) emission reduction as calculated over one (1) calendar month. A compliance test performed according to EPA Method 25 and 25A shall determine compliance with this requirement.

There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

- (b) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 14), because this source is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.

There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

### **State Rule Applicability - One (1) Rollcoating Line (identified as L-3)**

#### **326 IAC 8-2-5 (Paper Coating Operations)**

The one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is subject to the requirements of 326 IAC 8-2-5 (Paper Coating Operations) because it was constructed in June 1988, which is after the January 1, 1980 applicability date for this rule and the potential to emit of VOC from this unit is greater than twenty-five (25) tons per year.

When using compliant coating (emulsion coating), the thermal oxidizer is not required to control the VOC emissions to comply with 326 IAC 8-2-5 (Paper Coating Operations) because the VOC content of the emulsion coating is less than the 2.9 lbs of VOC per gallon of coating limit as specified in 326 IAC 8-2-5 (b). Therefore, when using emulsion coating the VOC emissions will be vented through the by-pass.

Pursuant to 326 IAC 8-2-5 (Paper Coating Operations):

- (1) The Permittee shall not cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator from a paper, plastic, metal foil, or pressure sensitive tape/labels coating line.
- (2) The thermal oxidizer for the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) shall be in operation at all times the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation to ensure compliance with this rule, except when using emulsion coating. Since the emulsion coating has a VOC content of 0.0096 pounds VOC per gallon of coating, it will be in compliance with this rule.

### 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAPs))

The pressure-sensitive vinyl/paper rollcoating (identified as L-3) is not subject to 326 IAC 2-4.1 (Major Source of Hazardous Air Pollutants (HAPs)) because the potential to emit of any single HAP is less than ten (10) tons per year and potential to emit of any combination of HAPs is less than twenty-five (25) tons per year.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) has applicable compliance monitoring conditions as specified below:

The L-3 thermal oxidizer shall operate at all times that the rollcoating line is operated, except when using emulsion coating. When operating, the thermal oxidizer shall maintain a minimum operating temperature of 1,273EF or a temperature, fan amperage, or duct velocity determined in the compliance tests.

These monitoring conditions are necessary because the thermal oxidizer for the rollcoating line (identified as L-3) must operate properly to ensure compliance with 40 CFR 60.440, Subpart RR, 326 IAC 8-2-5 (Paper Coating Operations) and 326 IAC 2-7 (Part 70).

## Proposed Changes

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per

hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); and

- (3c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, **except when using emulsion coating, and** exhausting to one (1) stack (S-3).

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

- (1a) One (1) pressure-sensitive vinyl rollcoating line, installed on July 1, 1980, identified as L-1, with maximum capacity of 24,750 square feet per hour, using one (1) 6.9 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-1);
- (2b) One (1) pressure-sensitive vinyl rollcoating line, installed on December 1, 1984, and one (1) surface coating head (CH-1), installed in 2001, identified together as L-2, with maximum capacity of 23,063 square feet per hour, using one (1) 9.8 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, exhausting to one (1) stack (S-2); and
- (3c) One (1) pressure-sensitive vinyl/paper rollcoating line, installed on June 1, 1988, identified as L-3, with maximum capacity of 30,750 square feet per hour, using one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer as VOC control, **except when using emulsion coating, and** exhausting to one (1) stack (S-3).

### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-5]

- (a) Pursuant to 326 IAC 8-2-5 (Paper Coating Operations), **the Permittee shall not** ~~no owner or operator of a facility engaged in the surface coating of pressure sensitive vinyl or paper~~ may cause, allow, or permit the discharge into the atmosphere of any volatile organic compound (VOC) in excess of two and nine-tenths (2.9) pounds per gallon of coating, excluding water, delivered to the coating applicator.
- (b) When operating the thermal oxidizer to achieve the limit for 326 IAC 8-2-5, **two and nine-tenths (2.9) pounds** of VOC emitted to the atmosphere per gallon of coating less water delivered to the applicator, the thermal oxidizer for line L-3 shall maintain a minimum 95% capture efficiency and 95% destruction efficiency. These efficiencies and the use of the thermal oxidizer are required by 326 IAC 8-1-2(a)(2), **except when emulsion coating is being used in L-3**. Based upon 326 IAC 8-1-2(c) and the overall control efficiency of 90%, the VOC content of the coating shall not exceed 47.85 pounds per gallon of coating solids delivered to the applicator.

### D.1.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3)(A) and 326 IAC 8-1-2(a)(7) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### D.1.10 Thermal Oxidizer

~~To ensure compliance with Conditions D.1.1 and D.1.2, the Line 2 and Line 3 thermal oxidizers shall operate at all times that the two (2) rollcoating lines are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,083 o F for Line 2 and 1,273 o F for Line 3 or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.~~

**To ensure compliance with Conditions D.1.1 and D.1.2:**

- (a) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl rollcoating line (identified as L-2) is in operation. The thermal oxidizer shall maintain a minimum operating temperature of 1,083EF or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.**
- (b) The thermal oxidizer shall operate at all times when the one (1) pressure-sensitive vinyl/paper rollcoating line (identified as L-3) is in operation, except when using emulsion coating. The thermal oxidizer shall maintain a minimum operating temperature of 1,273EF or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain an overall 90% control efficiency.**

Note: The name of the Office of Air Management (OAM) was changed to "Office of Air Quality (OAQ) throughout the permit.

### **Conclusion**

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Permit Modification No. 089-17858-00407.



**Appendix A: Emission Calculations**  
**VOC Emissions from the use of Emulsion Coating in L-3**

**Company Name:** Avery Dennison

**Address:** 270 West Meadow Place, Lowell, Indiana 46356

**MPM to TV:** 089-17858

**Pit ID:** 089-00407

**Reviewer:** ERG/SD

**Date:** September 19, 2003

Material	VOC Content (lb/gall)	Max. Usage Rate (lb/hour)	Weight % VOC	PTE of VOC (tons/year)
Emulsion Coating	0.0096	431	0.11%	2.1

**State Potential Emissions**

**2.1**

**Methodology**

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Potential To Emit of VOC (tons/year) = Max. Usage Rate (lbs/hour) \* Weight % VOC \* 8760 hours/year \* 1 ton/2000 lbs.